The Honorable James J. Robart 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 9 PETRA RUSSELL, 10 No. 2:22-cv-00531-JLR Plaintiff, 11 STIPULATED MOTION AND [PROPOSED] ORDER TO EXTEND v. 12 **DEADLINES** 13 WADOT CAPITAL, INC., a Washington NOTED FOR CONSIDERATION: Corporation; ERIK EGGER and NICOLE MAY 17, 2022 14 HOUSE, as WADOT CAPITAL, INC.'s governing persons; 15 MICHAEL WHITE; STEVEN WHITE; 16 HMJOINT, LLC, MICHELE CHAFFEE; 17 LISA HALLMON; 18 NCW TRUSTEE SERVICES, LLC, a Washington limited liability company; 19 TODD LINDSTROM CORPORATION 20 d/b/a CAPITAL COMPETE, a Washington 21 Corporation; TODD LINDSTROM AND JANE DOE LINDSTROM, as TODD 22 LINDSTROM CORPORATION d/b/a CAPITAL COMPETE's governing person; 23 and 24 JOHN DOES 1-10, 25 Defendants. 26 27

STIPULATION 1 Pursuant to Local Civil Rule 10(g), Plaintiff and Defendants, by and through their attorneys 2 of record, stipulate to the Court's entry of the proposed order set forth below. 3 In support of this request, the Parties represent the following: 4 1. 5 Defendants removed the case to this Court on April 20, 2022. (Dkt. No. 1.) 2. On May 12, 2022, Plaintiff filed a Motion to Remand, which is noted for June 3, 6 2022. (Dkt. No. 9.) 7 3. Given Plaintiff's Motion to Remand, the Parties have agreed to extend the 8 deadlines for the FRCP 26(f) conference, initial disclosure deadline, and joint status report by 9 10 sixty (60) days, pending the Court's ruling on Plaintiff's Motion to Remand. 4. The Parties respectfully request that the Court enter the order set forth below, 11 approving the requested extension. 12. DATED this 17th day of May, 2022. 13 14 BORIS DAVIDOVSKIY, P.C. SCHWEET LINDE & COULSON, PLLC 15 By: s/Boris Davidovskiy By: s/John A. McIntosh 16 Boris Davidovskiy, WSBA #50593 Thomas S. Linde, WSBA #14426 6100 219th Street SW, Suite 480 John A. McIntosh, WSBA #43113 17 Mountlake Terrace, WA 98043 575 S. Michigan Street 18 Tel: 425.582.5200 Seattle, WA 98108 Fax: 425.582.5222 Tel: 206.622.3150 19 boris@davidovskiylaw.com Fax: 206.757.7700 tomlinde@schweetlaw.com 20 Attorney for Plaintiff johnm@schweetlaw.com 21 Attorneys for Defendants WADOT Capital, 22 Inc., Erik Egger, Nicole House, Michael White, Steven White, HMJOINT, LLC, 23 Michele Chaffee, Lisa Hallmon 24 25 26 27

1	EISENHOWER CARLSON PLLC	FORSBERG & UMLAUF
1 2 3 4 5 6 7 8 9	By: s/Darren R. Krattli Darren R. Krattli, WSBA #39128 909 A Street, Suite 600 Tacoma, WA 98402-4395 Tel: 253.572.4500 Fax: 253.272.5732 dkrattli@eisenhowerlaw.com Attorneys for Defendants Todd Lindstrom Corporation and Todd Lindstrom, individually, and the marital community of Todd Lindstrom and Tia Lindstrom	By: s/Jeffrey T. Kestle Jeffrey T. Kestle, WSBA #29648 Nicole Theresa Morrow, WSBA #51546 John A. McIntosh, WSBA #43113 901 5th Avenue, Suite 1400 Seattle, WA 98164-1039 jkestle@foum.law nmorrow@foum.law Attorneys for Defendant NCW Trustee Services, LLC
11		
12		
13		
14		
15		
16		
17		
18		
19 20		
21		
22		
23		
24		
25		
26		
27		

ORDER Based on the foregoing stipulation, the Court ORDERS that the deadlines for the FRCP 26(f) conference, initial disclosure deadline, and joint status report be reset by sixty (60) days in accordance with the Parties' stipulation. DATED this 17th day of May 2022. UNITED STATES DISTRICT JUDGE

1	BORIS DAVIDOVSKIY, P.C.	SCHWEET LINDE & COULSON, PLLC
2	By: <u>s/Boris Davidovskiy</u>	By: s/John McIntosh
3	Boris Davidovskiy, WSBA #50593	Thomas S. Linde, WSBA #14426
4	6100 219 th Street SW, Suite 480 Mountlake Terrace, WA 98043	John A. McIntosh, WSBA #43113 575 S. Michigan Street
5	Tel: 425.582.5200 Fax: 425.582.5222	Seattle, WA 98108 Tel: 206.622.3150
6	boris@davidovskiylaw.com	Fax: 206.757.7700
7	Attorney for Plaintiff	tomlinde@schweetlaw.com johnm@schweetlaw.com
8		Attorneys for Defendants WADOT Capital,
9		Inc., Erik Egger, Nicole House, Michael White, Steven White, HMJOINT, LLC,
10		Michele Chaffee, Lisa Hallmon
11		
12		
13	EISENHOWER CARLSON PLLC	FORSBERG & UMLAUF
14		
15	By: s/Darren R. Krattli	By: s/Jeffrey T. Kestle
16	Darren R. Krattli, WSBA #39128 909 A Street, Suite 600	Jeffrey T. Kestle, WSBA #29648 Nicole Theresa Morrow, WSBA #51546
17	Tacoma, WA 98402-4395 Tel: 253.572.4500	John A. McIntosh, WSBA #43113 901 5th Avenue, Suite 1400
18	Fax: 253.272.5732 dkrattli@eisenhowerlaw.com	Seattle, WA 98164-1039 jkestle@foum.law
19		nmorrow@foum.law
20	Attorneys for Defendants Todd Lindstrom Corporation and Todd Lindstrom,	Attorneys for Defendant NCW Trustee
21	individually, and the marital community of Todd Lindstrom and Tia Lindstrom	Services, LLC
22	Town Distriction with 1th Distriction	
23		
24		
25		
26		
27		